

# **EXHIBIT 17**

**IN THE U.S. DISTRICT COURT FOR MARYLAND,  
SOUTHERN DIVISION**

BEYOND SYSTEMS, INC., )  
Plaintiff, )  
v. )  
WORLD AVENUE USA, LLC, et al. )  
Defendants. )

Case No. PJM 08 cv 0921

**WORLD AVENUE U.S.A., LLC'S RESPONSE TO PLAINTIFF'S  
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS<sup>1</sup>**

Defendant, WORLD AVENUE U.S.A., LLC ("WAUSA"), hereby responds to Plaintiff's  
Second Request for Production of Documents and states as follows:

## GENERAL OBJECTIONS

1. WAUSA objects to each Request for Production ("Request") to the extent that it may be construed as calling for information subject to any claim of privilege, including, but not limited to, the attorney-client privilege and/or the attorney work product doctrine. Pursuant thereto, WAUSA and its counsel hereby claim these privileges and object to any such request on this basis.

2. WAUSA objects to each Request to the extent that it may be construed as calling for information which constitutes or contains trade secret, proprietary, confidential, or commercially sensitive information, or other information, the disclosure of which would result in substantial injury to WAUSA.

<sup>1</sup> To the extent current Responses refer back to previously designated confidential Responses pursuant to the Confidentiality Order, the designation continues to apply.

**Response to Request No. 1 :**

Subject to the General Objections and to the specific objection to the Interrogatories, which are incorporated herein by reference, where specified in the Answers to Interrogatories, WAUSA refers Plaintiff to its previous answers to discovery requests, which are incorporated herein by reference.

**Request For Production No. 2:**

All documents produced by you to the Office of the Attorney General Office of Legal Affairs for the State of Florida, in the case of Office of the Attorney General vs. World Avenue U.S.A., LLC successor by merger to Niutech, LLC, et al, Case No. 07-00927-MB-CA-09 (Palm Beach County Circuit Court).

**Response to Request No. 2 :**

WAUSA objects to this Request on the grounds that it is overbroad and calls for information not relevant and reasonably calculated to lead to the discovery of admissible evidence. WAUSA also objects to this Request on the grounds that it calls for information protected by the attorney-client privilege or the work product doctrine. WAUSA objects this Request on the grounds that it is unduly burdensome because it is duplicative and calls for the production of documents already provided to Plaintiff in prior discovery responses.

WAUSA further objects to the definition of the term "YOU" insofar as it is overbroad. Accordingly, WAUSA construes this Request to refer to World Avenue USA, LLC, the named Defendant in this lawsuit formed on September 22, 2006, its officers, directors, employees, agents, representatives and attorneys. *See* DE 257 at p. 2.

Subject to and without waiving these objections, as set forth in the Objections and Answer to Interrogatory No. 1 of the Second Set of Interrogatories, WAUSA has no responsive

Respectfully submitted,

*Attorneys for World Avenue USA, LLC*

~~GREENBERG TRAURIG, LLP~~

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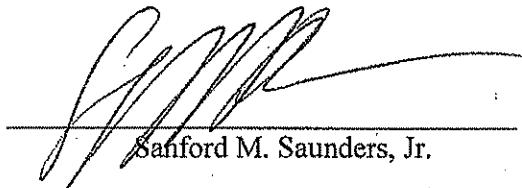
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served by E-mail this 29 day of June, 2010, on: Stephen H. Ring, Esq., [shr@ringlaw.us](mailto:shr@ringlaw.us), Stephen R. Ring, P.C., 506 Main Street, Suite 215, Gaithersburg, Maryland 20878, and Michael S. Rothman, Esq.,

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